



City of El Cajon

**Community Development Department
Housing Division**

FY 2023-2024

CDBG/HOME NOTICE OF FUNDING AVAILABILITY

**Applications and Proposals for Public Services, Public Facilities, &
Housing**

Community Development Department - Housing Division
200 Civic Center Way, El Cajon, CA 92020

Table of Contents

	<u>Page</u>
CDBG PROGRAM INFORMATION AND GUIDELINES	3
Overview	3
Applicant Eligibility	4
Project Eligibility for CDBG Funding.....	4
Documentation of Benefit to LMI Persons	7
HUD's Definition of Disabled Person	8
HUD's Definition of Elderly Person / Household	8
Project Eligibility for HOME Funding.....	9
Environmental Review Requirements	10
ADA Accessibility	10
Conflict of Interest	10
Davis-Bacon Labor Standards	11
Lead-Based Paint Regulations	11
Asbestos Testing	11
Section 3 Requirements	11
Licensing and Fingerprinting.....	12
Volunteers.....	12
Matching or Leveraged Funds.....	12
General Subrecipient Requirements	13
Compliance with Applicable Laws, Rules, Regulations.....	13
CDBG APPLICATION REVIEW PROCESS	16
Technical Assistance Available	17
Summary – Additional Program Requirements	18
Premature Commitment or Expenditure Prohibited	18
<u>Attachments</u>	
Attachment A – FY 2023-2024 Action Plan Timeline	19
Attachment B – Area Median Income Limits Table (2022)	20
Attachment C – Census Tract Map of LMI Areas	21
Attachment D – Reporting Requirements for Agencies	22
Attachment E – Insurance Requirements (Public Service Projects)	24
Attachment F – Insurance Requirements (Public Facilities Projects)	26
Resources and References.....	27

CITY OF EL CAJON

CDBG PROGRAM INFORMATION AND GUIDELINES

These Guidelines contain the requirements and procedures for submittal and processing of Applications for CDBG and HOME Funding, as well as the policies and processes for development and implementation of the City's One Year Action Plan. See **Attachment A** for FY 2023-2024 Action Plan development and implementation timeline.

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM AND HOME INVESTMENT PARTNEERSHIPS ACT (HOME) OVERVIEW:

Welcome to the City of El Cajon's Community Development Block Grant (CDBG) Program and HOME Investment Partnerships Act (HOME) Program. The CDBG and HOME program is administered by the Community Development Department – Housing Division. The U.S. Department of Housing and Urban Development (HUD), provides annual grants on a formula basis to entitlement cities and counties, including the City of El Cajon.

The statutory primary objectives of the CDBG program are to develop viable urban communities by providing decent housing, a suitable living environment, and by expanding economic opportunities, principally for low and moderate-income persons. HOME funds are dedicated to housing activities that meet local housing needs and typically preserve or create affordable housing. Uses include tenant-based rental assistance, rehabilitation, homebuyer assistance and new construction. HOME funds may also be used for site acquisition, site improvements, demolition and other necessary activities related to developing non-luxury housing ([see 24 CFR Part 92](#)).

These Guidelines are for projects seeking funding during the fiscal year that begins on **July 1, 2023**. The specific amount of funding to be received from HUD for FY 2023-2024 has not yet been decided by Congress. However, in fiscal year 2022-2023, the City received a 7.10 percent reduction in CDBG. The current state of the national economy may also have an impact on the final funding levels.

In FY 2023-2024, the City anticipates receiving approximately \$1,219,861 in CDBG funds. Of that amount, a maximum of 15% of the total allocation (approximately \$182,979) may be made available for public services programs and projects. Another 20% of the CDBG allocation is reserved for administration and mandatory fair housing requirements, and continuing housing programs), will be available for public facilities and infrastructure projects.

In FY 2023-2024, the City anticipates receiving approximately \$665,010 in HOME funds. Of that amount, a minimum of 15% of the total allocation (approximately \$99,751) must be reserved for eligible affordable housing activities to be conducted by Community Housing Development Organizations (CHDOs). A maximum of 10% (approximately \$66,501) of the HOME allocation is reserved for planning and administration.

For CDBG FY 2023-2024, two types of activities will be funded through this application process: 1) Public Facilities/Capital Improvement/Other projects; and 2) Public Services projects and programs.

For HOME FY 2023-2024, one type of activity will be funded through this application process: 1) Production of Affordable Housing.

APPLICANT ELIGIBILITY:

The following organizations are eligible to apply for this funding:

- **Non-profit organizations, City departments, neighborhood organizations, schools, and faith-based organizations may apply for this funding.** Non-profit organizations must be granted non-profit status under the Internal Revenue Code (Section 501(c)(3), (c)(4) or (c)(5)), and must be incorporated for at least one (1) year by the Application submittal date.
- Faith-based organizations are eligible to receive CDBG funds with certain limitations. [Please refer to HUD Notice CPD-04-10: Ensuring Equal Treatment of Faith-based Organizations participating in HOME and CDBG.](#)

Note: The City of El Cajon does not directly fund individuals through this program.

PROJECT ELIGIBILITY FOR CDBG FUNDING:

In order to qualify for CDBG funding, federal regulations require that all programs and projects must: A) meet one of three National Objectives; B) address one or more of the adopted Consolidated Plan Goals and Priorities; C) be an eligible activity as set forth in [24 CFR §570.201-206](#); and D) not be ineligible as set forth in [24 CFR §570.207](#), among other requirements. **Projects that fail to meet these applicable tests will not be considered for CDBG funding.**

A. National Objectives. CDBG projects must meet one of the National Objectives as set forth in [24 CFR §570.208](#):

- 1) **Benefit the majority of low and moderate-income (LMI) residents.** "Low and moderate income" is defined as those persons and households who earn at or below 80% of the Area Median Income (AMI) adjusted for family size for the San Diego Metropolitan Service Area (MSA) as defined in Section 102 of the Housing and Community Development Act of 1974, as amended. Income limits are adjusted annually by HUD. See **Attachment B** of these Guidelines for current AMI limits. Documentation of benefit to LMI persons is required for all CDBG-funded projects; or
- 2) Meet a community need having a particular urgency because existing conditions pose a serious and immediate threat to the health and/or welfare of the community and no other financial resources are available to meet the need; or
- 3) Aid in the prevention or elimination of conditions of slum and blight.

Note: In El Cajon, all CDBG-funded activities must address the National Objective to benefit LMI residents of El Cajon.

B. Consolidated Plan Goals and Priorities. On April 23, 2019, the City adopted local Goals and Priorities for allocation of CDBG funding. The Goals and Priorities, summarized below, are more fully described in the FY 2019-2023 Five Year Consolidated Plan which is available on the City's webpage at www.elcajon.gov/housing or a copy can be requested by emailing housing@elcajon.gov. CDBG projects must address one or more of the local Goals/Priorities to qualify for funding:

Goal 1: Provide Decent and Affordable Housing

Priority Need: Conserve and Improve Existing Affordable Housing

- Assistance to aid in the rehabilitation of single-family, mobile home, and multi-family housing units.
- Acquisition, with or without rehabilitation, of multi-family projects

Priority Need: Provide Homeownership Assistance

- Assistance to qualifying low and moderate income households to achieve homeownership.
- Assistance to developers for the acquisition and re-sale of housing units (with or without rehabilitation) to low and moderate income homebuyers.

Priority Need: Assist in the Development of Affordable Housing

- Assistance to developers in the development of affordable housing, including acquisition, land assemblage, construction, conversion, purchase of affordability covenants, or other mechanisms.
- Assistance to housing developers for the acquisition and new construction of housing units to low and moderate income homebuyers.

Goal 2: Support a Continuum of Care System for the Homeless

Priority Need: Support Continuum of Care System for the Homeless

Goal 3: Provide Community Facilities and Infrastructure

Priority Need: Provide Community Facilities & Infrastructure

- Upgrading existing park facilities, especially Wells Park.
- ADA concrete projects, including new and retrofitted curb ramps, streets, sidewalks and gutters.
- Improvements to streets and streetscapes in residential neighborhoods, such as neighborhood trails, lighting and other safety/security improvements.
- Assistance to service providers for necessary improvements to public facilities serving special needs populations.
- Periodically assess the need for and (when determined to be warranted) pursue Section 108 loans for large-scale public improvement and revitalization projects.

Goal 4: Provide Community and Supportive Services

Priority Need: Provide Needed Community and Supportive Services

- Provide for a variety of community and supportive services, with special emphasis on crime awareness and prevention programs, services for the homeless, seniors, at-risk youth, the disabled, and other persons with special needs

All Goals: Planning and Administration

Priority Need: Administer CDBG and HOME projects; Provide Fair Housing Services

C. Eligible Activities. Further, CDBG projects and activities must be eligible as set forth in [24 CFR §570.201-206](#):

Public Service Activities: Eligible programs under the Public Services category include services concerned with employment, crime prevention, childcare, health, drug abuse, education, welfare, or recreation.

Examples of services and programs potentially eligible under this category include:

- Neighborhood revitalization services - Programs that support neighborhood revitalization efforts in targeted areas.
- Crime awareness and prevention programs serving low-income residents.
- Programs providing services to homeless and non-homeless special needs persons, such as disabled persons, the elderly (62 years or older) and other persons with special needs.
- Fair housing counseling and housing services.
- Energy conservation counseling and testing.
- Emergency food.

Public Facilities/Capital Improvement Activities: Eligible projects under this category include public facilities, community facilities, and public improvement projects, including but not limited to all facilities that are publicly-owned or privately-owned (by an organization or school) and open to the general public, and provide a benefit to low income residents or low income areas that are primarily residential.

Examples of projects potentially eligible under this category include:

- Acquisition of real property for a public purpose.
- Disposition of real property acquired by CDBG funds.
- Clearance, demolition, and removal of buildings and improvements.
- Interim assistance to alleviate harmful conditions in deteriorating areas where permanent improvements will be carried out at a later date.
- Relocation payments and assistance for persons displaced by community development program activities.
- Removal architectural barriers to enhance the mobility and accessibility for elderly and disabled persons to publicly or privately owned buildings.
- Equipment under limited circumstances needed to either administer a CDBG-funded activity or to deliver a CDBG-funded service. (For example, a van used by a public service agency). Requests for funding of equipment will require additional documentation to confirm CDBG program eligibility.
- Acquisition, construction, reconstruction, rehabilitation, or installation of public facilities and improvements including senior citizen centers, parks, playgrounds, centers for the disabled, neighborhood facilities, solid waste disposal facilities, fire protection facilities and equipment, parking facilities, public utilities, street improvements, water and sewer facilities, foundations and platforms, pedestrian walks and walkways, and flood and drainage facilities. Buildings for the general conduct of business are excluded.
- Acquisition, construction, reconstruction, rehabilitation, or installation of distribution facilities of privately owned utilities where necessary and appropriate to implement revitalization or housing.
- Rehabilitation and preservation of privately owned buildings, including low income housing, publicly owned residential and non-residential buildings (except buildings for the general conduct of business), code enforcement, and historic preservation.

- Special economic development activities if necessary and appropriate to implement strategies for neighborhood revitalization, community economic development, or energy conservation carried out by neighborhood based nonprofit organizations, local development corporations, or small business investment companies.

D. Ineligible Activities. CDBG projects must not be ineligible as set forth in [24 CFR §570.207](#).

Examples of activities that will render a project ineligible include:

- Programs or services that primarily serve non-EI Cajon residents.
- Projects or programs that do not serve primarily low-income persons.
- General government expenses.
Funds spent on buildings used for the general conduct of government, except to remove architectural barriers.
- New housing construction
- Maintenance and operating expenses without providing a service
- Political activities
- Income payments, stipends, marketing, or fundraising
- Impact fees associated with construction activities.
- Purchase of equipment, furnishings or personal property
- Services that promote religious activities
- Payment of debt or pre-award expenses
- Entertainment, furnishings and personal property

DOCUMENTATION OF BENEFIT TO LOW AND MODERATE-INCOME BENEFICIARIES:

As noted above, all programs and projects funded with CDBG funds must benefit primarily LMI individuals and families (the primary national objective). Documentation of benefit to LMI persons is required for all CDBG-funded projects.

In order to determine whether and how a project benefits LMI persons, the applicant must clearly define who will be served by the project or service (the “target population”). Once the target population is determined, the proposed project will be categorized as either Area Benefit or Limited Clientele.

A. **Area Benefit.** If the program or project serves all residents of a particular area that contains primarily LMI persons, the project may qualify as an Area Benefit activity. For these activities:

1. The boundaries of the service area must be clearly defined. Applicants **must** attach a map (use the map in **Attachment C** or a Thomas Bros. map page) marking the project location and with lines or circles drawn on the map outlining the boundaries of the geographic Area served; and
2. At least 51% of the residents in the service area must be LMI.

B. **Limited Clientele.** If the project serves a particular clientele that is primarily LMI (but otherwise serves the entire city), the project may qualify as a Limited Clientele activity. For these activities:

1. Intake and/or qualification procedures must be in place (or be developed) that capture required demographic information from each participant, including race, ethnicity, household size and the income levels of all persons being served; AND
2. At least 51% of the persons served by the proposed program must be LMI (see **Attachment B – Area Median Income Limits**); OR
3. Presumed benefit: If the program exclusively serves clientele that are “presumed” to be LMI, income qualification is not required and does not need to be collected; however, information about race, ethnicity, etc. must still be collected. “Presumed benefit” populations include abused children, battered spouses, elderly persons (age 62 and older), severely disabled adults, homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers.

Please call Community Development staff at (619) 441-1710 or email housing@elcajon.gov for help in determining whether your project meets a National Objective, the category of benefit, and the documentation necessary to document the benefits to LMI persons. Community Development staff will make the final determination of which category a project or program will fall into and the level of documentation required.

HUD’S DEFINITION OF DISABLED PERSON:

A person who is determined to:

1. Have a physical, mental, or emotional impairment that:
 - a. Is expected to be of long-continued and indefinite duration;
 - b. Substantially impedes his or her ability to live independently; and
 - c. Is of such a nature that the ability could be improved by more suitable housing conditions; or
2. Have a developmental disability, as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001-6007); or
3. Be the surviving member or members of any family that had been living in an assisted unit with the deceased member of the family who had a disability at the time of his or her death.

HUD’S DEFINITION OF ELDERLY PERSON / HOUSEHOLD:

A household where either the head of the household, or spouse/co-head, is age 62 or older.

CITY OF EL CAJON

HOME PROGRAM INFORMATION AND GUIDELINES

PROJECT ELIGIBILITY FOR HOME FUNDING:

Up to \$2,365,757 in HOME funds are available for the Production of Affordable Housing. Examples of activities that can be funded are the following:

1. Acquisition
2. Acquisition and Rehabilitation
3. Rehabilitation of single family homes and mobilehomes
4. Rental assistance programs
5. Construction of new affordable units.

At least 15 percent of HOME Investment Partnerships Program (HOME) funds must be set aside for specific activities to be undertaken by a special type of nonprofit called a Community Housing Development Organization (CHDO). A CHDO is a private nonprofit, community-based organization that has staff with the capacity to develop affordable housing for the community it serves. In order to qualify for designation as a CHDO, the organization must meet certain requirements pertaining to their legal status, organizational structure, and capacity and experience.

CHDOs may use HOME funds for all eligible HOME activities. However, in order to count towards the 15 percent set-aside, a CHDO must act as the owner, developer, or sponsor of a project that is an eligible set-aside activity. These eligible set-aside activities include: the acquisition and/or rehabilitation of rental housing; new construction of rental housing; acquisition and/or rehabilitation of homebuyer properties; new construction of homebuyer properties; and direct financial assistance to purchasers of HOME-assisted housing that has been developed with HOME funds by the CHDO.

For more information on Community Housing Development Organizations, see [24 CFR 92 Subpart G](#):

- [24 CFR 92.208](#) - Eligible CHDO operating expenses and capacity building costs
- [24 CFR 92.300](#) - Set-aside for community housing development organizations
- [24 CFR 92.301](#) - Project-specific assistance to community housing development organizations

Please verify areas of high-concentration of affordable housing prior to proposing a new project and ensure that the project meets HUD's §92.202 "Site and Neighborhood standards. Proposals for affordable housing projects are only accepted through Notices of Funding Availability or Request for Proposals, which are periodically released by the Community Development Department - Housing Division. To discuss a potential affordable housing project/program utilizing Home Investment Partnerships Act, please contact José Dorado, Housing Manager, at (619) 441-1786 or via email at jdorado@elcajon.gov.

Applicants should be familiar with the HOME Program's Commitment and Expenditure requirements found in this HUD Federal Register Notice.

<https://www.govinfo.gov/content/pkg/FR-2022-09-22/pdf/2022-20425.pdf>

CITY OF EL CAJON

OTHER PROGRAM REQUIREMENTS

ENVIRONMENTAL REVIEW REQUIREMENTS:

An Environmental Review is required for each project or program that receives CDBG or HOME funding. **Premature commitment or expenditure of any funds prior to completion of the environmental review will jeopardize the eligibility of the project.** This includes use of an agency's matching funds from other sources. Environmental reviews are required to comply with National Environmental Policy Act (NEPA) and HUD's enforcement measures. The review includes analysis of 13 federal laws designed to protect certain environmental areas. If the Application is funded, City staff will initiate the review and the agency will be kept informed about the estimated length of time to clear the project.

The environmental review process for Public Service programs usually (but not always) requires a lower level of review, normally can be completed at no cost, and can usually be cleared quickly so as not to delay the program start up. However, especially for Public Facilities projects, if an Environmental Assessment or higher level of review is required, the project applicant may be required to engage a qualified professional from an outside environmental consulting organization whose qualifications must be approved by the City prior to engagement, at its own cost. Depending upon the project location and environmental conditions, projects involving construction, rehabilitation and demolition can take up to 120 days to obtain an environmental clearance.

ADA ACCESSIBILITY FOR PERSONS WITH DISABILITIES:

The Americans with Disabilities Act (ADA), State Title 24, and the Fair Housing Act prohibit discrimination based on disability. Please be advised that your project will be reviewed for compliance with federal and state laws as they relate to accessibility. Accessibility includes such things as: entrance ramps, parking with universal logo signage, grab bars around commodes and showers, required height for toilet seats, space for wheelchair maneuverability, accessible water fountains and counters, and other improvements needed to assure full access for the disabled, including the blind and deaf. Additional information can be found at www.ada.gov.

CONFLICT OF INTEREST:

Conflicts of interest (or appearance thereof) can plague activities supported with federal funds. The general rule is that no employee, board member, officer, agent, consultant, elected official, or appointed official of the recipients or subrecipients that are receiving funds under a CDBG-assisted program or HOME-assisted program who have responsibilities with respect to the CDBG activities and HOME activities or are in a position to participate in decision-making processes or have access to inside information with regard to the activities, can obtain a financial interest or benefit from a CDBG assisted activity or HOME assisted activity during their tenure or for one year thereafter (Federal Regulation 24 CFR 570.611 for CDBG and Federal Regulation 24 CFR 92.356 for HOME). Agencies should maintain a written code of standards of conduct governing the purchase of materials, product, supplies, and services and awarding and administering sub-recipient contracts. Personnel involved in the procurement process must be trained to recognize situations that create conflicts of interest, or the appearance of a conflict of interest.

The agency personnel should:

- Be familiar with the agency's code of ethics and potential conflict of interest issues.
- Not take gifts or gratuities from persons or organizations associated with the procurement process.

DAVIS-BACON LABOR STANDARDS:

Construction work that is financed in whole or in part with CDBG funds is most likely subject to the Federal labor standards requirements, including the Davis-Bacon and Related Acts, for payment of prevailing wages. Additional information is available in the publication *Contractor's Guide to Davis-Bacon: Prevailing Wage Requirements for Federally-Assisted Construction Projects*. A copy of this publication may be obtained from the HUD Davis-Bacon and Labor Standards website located at https://www.hud.gov/program_offices/davis_bacon_and_labor_standards/OLRLibrary, which contains additional labor compliance resources that may be of assistance. Triggering of Davis-Bacon and Related Acts may increase the project costs.

If construction work is proposed, contact CDBG or HOME Program staff at (619) 441-1710 for assistance in determining whether your project is subject to Davis-Bacon requirements.

LEAD-BASED PAINT REGULATIONS:

HUD has issued final regulations on notification, evaluation, and reduction of lead-based paint hazards in some facilities receiving federal assistance. Rehabilitation of facilities where children are served may be affected by this new regulation resulting in testing the painted surfaces that will be disturbed to determine the presence of lead-based paint. If paint surfaces are not lead-free, safe work practices will be required along with possible methods of removal.

ASBESTOS TESTING:

An asbestos survey (AHERA) is required on all renovation projects to determine the presence of asbestos. The agency should include the cost of the survey and provide for contingency funds for remediation if asbestos is present. The survey will visually review all suspect asbestos containing materials (ACMs) associated with the building's interior and will collect samples for laboratory analysis prior to the Public Facilities renovation project. The survey will identify whether asbestos containing materials were found and what classification.

SECTION 3 REQUIREMENTS:

All housing construction, demolition, rehabilitation and other public construction projects funded with CDBG or HOME funds of more than \$200,000 must comply with Section 3 requirements *to the greatest extent feasible*. The City is committed to improving economic conditions in our community. The City will actively implement Section 3 regulations to direct work paid for by federal funds to Section 3 Workers, Targeted Section 3 Workers and to Section 3 Business Concerns. Under the federal regulations, and in accordance with the City's Section 3 Implementation Plan, the City and its Contractors will satisfy the "*greatest extent feasible*" requirements by meeting the following numerical goals and prioritization of efforts:

- 1) **25% of total labor hours for Section 3 project must be worked by a Section 3 Worker.**
A **Section 3 Worker** is defined as a low or very-low income individual, or a Youthbuild participant, or employed by a Section 3 Business Concern.
- 2) **5% of total labor hours for Section 3 project is worked by a Targeted Section 3 Worker.**
A **Targeted Section 3 Worker** is defined as a Section 3 Worker who is employed by a Section 3 Business Concern, or who currently fits or when hired fit the following criteria, as documented in the previous five years (but not earlier than November 30, 2020): living within the service area, or the neighborhood of project, or a Youthbuild participant.
- 3) **Prioritization of Efforts: employment and training arising from Section 3 projects are given to Section 3 workers and contracts are given to Section 3 business concerns.**
When feasible, priority should be given to Section 3 workers residing within the service area or the neighborhood of the project and Youthbuild participants. When feasible, priority should also be given to Section 3 business concerns that provide economic opportunities to Section 3 workers residing within the metropolitan service area in which the project is located and Youthbuild programs.

LICENSING AND FINGERPRINTING:

All CDBG and HOME funded programs and facilities serving specific populations (children, elderly, disabled, etc.) must be in full compliance with any and all Federal, State and local requirements for licensing and fingerprinting. If your project or program is determined to be out of compliance, the CDBG grant funds awarded may be affected, up to and including termination of the grant agreement.

VOLUNTEERS:

The use of volunteers on a Public Facilities project, who are not otherwise employed by the agency or contractor, requires City approval. Depending on the work the volunteers will perform, state-licensing requirements will apply. For example, volunteers performing trade work (electrical, plumbing) must be licensed. To determine in-kind volunteer contributions requested in the budget, use the estimated amount of what a paid worker would earn doing the same type of work.

MATCHING OR LEVERAGED FUNDS (COST SHARING):

Matching or leveraged funds are those other agency resources (non-CDBG or non-HOME) immediately accessible and firmly committed that are to be applied to the program or project. Leveraged funds can include a combination of cash, grants, loans, or in-kind resources available to finance the program costs. Program costs can be shared among all leveraged funding sources. In-kind contributions must have a specific dollar value established in accordance with generally accepted accounting principles. The basis of determining the value for personal services and donated materials and supplies must be identified and documented in the Application. Volunteer services may be counted if the service is an integral and necessary part of an approved CDBG-funded program or HOME-funded program. Rates for hours should be consistent with those paid for similar work in the labor market in which the applicant competes for the services involved. The value assigned to donate materials and supplies should be reasonable and should not exceed market value at the time of donation.

GENERAL SUBRECIPIENT REQUIREMENTS:

- **Operating Agreement/Contract:** Nonprofit agencies and organizations approved for funding will be required to sign an agreement with the City in order to ensure compliance with the appropriate program regulations. City Departments receiving CDBG funds will be issued a Memorandum outlining the CDBG requirements, scope of work and budget detailing the project/program expenditures deadlines.
- **Leverage/Match Funds:** Applicants must demonstrate that CDBG and HOME funds will be leveraged or matched with resources from other federal, state, local, or private sources as required by each program. Match or leverage may be cash or grant, but must be available during the project period. For the HOME program, 25% (non-federal) matching funds must be available at the time of application and must be spent prior to reimbursement from HOME.
- **Readiness:** Projects must display evidence of readiness to proceed. Other funding must be in place and all requirements met prior to submission of application. CDBG and HOME funds must be spent within the specified amount of time as determined for each project. CDBG Public Services projects must be implemented by July 1, 2023. HOME projects should demonstrate project readiness to meet the HOME commitment requirements found in [24 CFR 92.205](#).
- **Program Monitoring:** Applicants approved for funding will be required to maintain and submit adequate information necessary to monitor program accountability and progress in accordance with the terms and conditions of the agreement.
- **Notification:** All applicants will be notified between February-March 2023 of recommended funding recommendations and between April-May 2023 of final Council recommendations. Receipt of an award letter does guarantee funding. Please be aware that past funding does not guarantee future funding or funding at the same level.
- **CDBG/HOME Agreement:** Each applicant, if awarded CDBG or HOME funding, will be required to comply with the terms of a City Contract, including insurance requirements. City reimburses Subrecipient for the costs it incurs for work performed during the term of the approved Subrecipient agreement/MOU. No claims shall be reimbursed without submitting supporting documentation and in the City approved format. The final agreements for 2023-2024 will be available in June 2023.
- **Policies and Procedures:** Each organization, if awarded CDBG or HOME funding, will be required to have programmatic Policies and Procedures in place for the specific program applied for. In the event that the organization is funded, submittal of a copy of the organization's Policies and Procedures will be required.

COMPLIANCE WITH APPLICABLE LAWS, RULES, AND REGULATIONS:

Applicants that are awarded CDBG or HOME funding must act in accordance with all relative federal, State of California, and City of El Cajon laws, rules, and regulations. These include but are not limited to the following:

- **24 CFR Part 570**, as amended – The regulations governing the CDBG program.
- **24 CFR Part 92**, as amended - The regulations governing the HOME program.

- **24 CFR Part 107 and 108** – The regulations issued following Executive Order 11063 and Executive Order 12892 which prohibit discrimination and promote equal opportunity in housing.
- **Age Discrimination Act of 1975 (42 U.S.C. 6101)** – The regulations that prohibit discrimination on the basis of age.
- **Copeland “Anti-Kickback” Act (18 U.S.C. 874 and 40 U.S.C. 276c)** – The regulations on contracts for construction or repair awarded by Subrecipients shall include a provision for compliance.
- **24 CFR Part 58** – The regulations prescribing the Environmental Review procedure under the National Environmental Policy Act of 1969.
- **National Flood Insurance Act of 1968, 24 CFR Part 55 under Executive Order 11988** – The regulations for proposed projects and properties located in a floodplain.
- **36 CFR Part 800** – The regulations outlining the procedures for the protection of historic and cultural properties.
- **Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970** – the policies for displacement, relocation assistance, and real property acquisition as defined by 42 U.S.C. 4601 (URA) and implementing regulations issued by the Department of Transportation at 49 CFR part 24 and section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)).
- **24 CFR Part 7 and 41 CFR Part 60** – The regulations outlining equal employment opportunity without regard to race, sex, color, religion, age, national origin, and disability in federally assisted construction contracts.
- **24 CFR 75** – Regulations outlining requirements of Section 3 of the Housing and Urban Development Act of 1968 providing for economic opportunities for low and very low local residents. All projects must, to the greatest extent feasible, provide opportunities for training and employment for low and moderate income persons residing within the City of El Cajon, and contracts or work in connection with the project be awarded to eligible business concerns which are located in or owned in substantial part by persons residing in the City of El Cajon.
- **Residential Lead Based Paint Hazard Reduction Act of 1992** – The regulations implemented by 24 CFR Part 35, Subpart B imposes certain requirements on disclosure of lead based paint hazards.
- **24 CFR Part 24** – The regulations that prohibit use of debarred or suspended contractors on federally assisted projects and Drug Free Workplace requirements, issued according to Executive Order 12459.
- **24 CFR Part 84 and OMB Circular A-110** – Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Nonprofit Organizations. These regulations include Conflict of Interest provisions under 24 CFR 84.42 and 570 as it applies to procurement.

- **24 CFR Part 85** – Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.
- **2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (previous known as OMB Circular A-122/A-133).**
- **24 CFR Part 49** – The regulations on eligibility restrictions for certain resident aliens.
- **24 CFR Part 87 and Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)** – The regulations for restrictions on lobbying and required certifications.
- **Executive Order 13170** – The regulations on increasing opportunities and access for Disadvantaged Businesses.
- **HUD Requirements** – All other applicable required reports, circulars, and procedures.
- **Administrative Procedures** – The rules issued by the City of El Cajon in relation to contracts, process, and procedures.
- **Clean Air Act (42 U.S.C. 7401) and the Federal Water Pollution Control Act (33 U.S.C. 1251 et seq.)** – The regulations that require compliance with all applicable standards, orders, or regulations issued following the rule.

CDBG and HOME APPLICATION REVIEW PROCESS

The City of El Cajon's CDBG and HOME funds will be allocated annually through an Application process to the maximum extent practicable within the City of El Cajon. To encourage public participation in the development of the CDBG and HOME program, the City has adopted a Citizen Participation Plan which outlines the procedures to be followed by public officials and private citizens to establish projects to be funded for a given program year that address identified needs in the Five Year Consolidated Plan. The complete Citizen Participation Plan is available for review in the City of El Cajon, Project Assistance Center, 200 Civic Center Way, First Floor, El Cajon, CA 92020 and on-line at www.elcajon.gov/housing under "Funding Sources."

A summary of the Application Review Process is provided below for applicants and/or private citizens who wish to participate in the City's CDBG and HOME program:

- Applications for CDBG and HOME funds for the FY 2023-2024 program year will be available beginning November 21, 2022. **Applications for this NOFA process will be accepted by the Community Development Department – Housing Division until 5:00 pm on Wednesday, December 21, 2022.**
- Upon receipt of an Application received prior to the deadline, Community Development staff will log the Application and mark it with the date and time received. Applications received after 5:00 pm on December 21, 2022, will not be reviewed as a part of this NOFA process.
- Staff will initially review all Applications for completeness, conformance with technical criteria as listed in these Guidelines and the Application itself, and if appropriate, will transmit a copy of the Application submittal to appropriate City departments for additional review. Criteria for review will include, but not be limited to:
 - Eligibility of the activity under CDBG regulations;
 - Eligibility of the activity under the HOME regulations;
 - Capital Improvement Projects are located in low and moderate income census tracts (i.e. CDBG Areas) which are primarily residential and are not along a commercial corridor; and
 - Serves Low-Moderate Income El Cajon Residents;
 - Compliance with a CDBG national objective;
 - Consistency with the priorities and specific Goals established in the Five Year Consolidated Plan;
 - The application demonstrates qualified principal staff related to the project and/or service to be implemented or prior experience with CDBG, HOME, and/or other grant programs;
 - Prior experience in the community;
 - Agency administrative and financial capacity to carry out the proposed activity;
 - Feasibility and appropriateness of the project budget;
 - The organization has demonstrated a comprehensive fundraising plan a committed to leveraging for this project;
 - The agency has the appropriate staff and resources to implement the outreach and marketing program to reach the target population;
 - The organization demonstrates that it is ready to begin the project and has gone through the necessary steps to ensure timely completion of the project; and
 - The project demonstrates reasonable and efficient costs for operations and project implementation.

Staff may request additional information from applicants for further clarification as required. This review summarizes the project and notes any concerns with the proposal.

- Funding recommendations will then be made to the El Cajon City Council for consideration.
- Agencies will be notified by mail of their project's eligibility/ineligibility. Applications which are determined to be ineligible will be allowed a 7-day period for submittal of additional information in support of reversing the determination.
- An internal review committee may be utilized. If utilized, review committee members will be provided with the Applications, the technical review summaries, and any agency response, if additional information was requested.
- Staff (and the review committee, if any) will review each eligible Application, and will forward recommendations to City Council at the first Public hearing (typically held in February). Staff will make copies of all eligible Applications available for City Council and public review 72 hours prior to the Public hearing(s).
- Applicants and citizens are invited to provide comments on projects submitted, respond to any questions by the City Council, and to provide comments and input relative to the development of the One Year Action Plan. The City Council will tentatively select projects to be funded at the first Public hearing.
- Following City Council's tentative allocations at the first Public Hearing, a Notice of Public Review and Comment Period will be published that will include the full listing of tentatively approved projects and their proposed allocation amounts that may be included as a part of the One Year Action Plan. The public is invited to provide written comments on the proposed projects/allocations and any other input relative to the development of the One Year Action Plan during that period (a minimum of 30 days).
- The City Council will review and adopt final allocations to projects and programs at a second Public Hearing (typically held in April). These final allocations will be included in the One Year Action Plan that will be submitted to HUD prior to the start of the program year.
- Once the One Year Action Plan is approved by HUD and all other stated conditions are met (including completion of the required Environmental Review), project activities may begin (but not earlier than July 1, 2022).

TECHNICAL ASSISTANCE AVAILABLE:

The CDBG and HOME program staff are available to provide technical assistance in determining project/program eligibility and to ensure proposed projects are in compliance with the CDBG National Objectives, HOME, and other regulations established by HUD. Staff cannot provide assistance in developing a project, program, or writing the Application.

Technical assistance is available from 7:30 a.m. to 5:30 p.m. Monday through Thursday, and from 8:00 a.m. to 5:00 p.m. on alternating Fridays. Please contact Housing staff at (619) 441-1710 or via email at housing@elcajon.gov for assistance by telephone or to make an appointment in the office prior to this date.

SUMMARY OF ADDITIONAL CDBG and HOME PROGRAM REQUIREMENTS:

- Congress created the CDBG and HOME program and numerous federal regulations apply. Agencies that are funded (Subrecipients) will be required to execute a contract with the City listing their responsibilities for meeting all federal requirements along with the City.
- Affirmative action, nondiscrimination in services and employment practices, and ADA requirements apply; certification of a Drug Free Work Place is required.
- Subrecipients and contractors must not be de-barred.
- Funded agencies cannot be indebted to the IRS or to the City of El Cajon nor have judgments or liens.
- The City's **Section 3** and **MBE/WBE** goals must be met to the greatest extent feasible.
- Subrecipients and contractors must have a verifiable SAMs number.
- City and HUD shall have access to the project records and payroll records as set forth in the funding agreement.
- Subrecipients are responsible for Worker's Compensation benefits, or claims by employees and must indemnify and hold the City harmless against any and all claims.
- CDBG funds are reimbursed based upon required source documentation, i.e. timecards, cancelled checks, receipts, bank statements, etc. Reimbursements can be made monthly or quarterly at City's sole discretion.
- **Quarterly and Annual performance reports are required** (see Attachment D – Reporting Requirements for Funded Agencies).
- Proof of Insurance is required if funding is awarded (see Attachments E and F – Insurance Requirements).

PREMATURE COMMITMENT OR EXPENDITURE OF FUNDS PROHIBITED:

Program expenses that have been committed or expended prior to HUD approval of the One Year Action Plan, City Council approval of the project allocation, NEPA environmental clearance, and execution of the CDBG or HOME contract may not be eligible for reimbursement.

ATTACHMENT A – FY 2023-2024 ACTION PLAN TIMELINE***

*****All dates listed herein are tentative and are subject to change.** Persons relying on this Schedule must contact Community Development -- Housing staff at (619) 441-1710 or housing@elcagon.gov to confirm the actual date of each event listed below as the timeframe nears.***

November 17, 2022	"Notice of Funding Availability" published in the newspaper and emailed to interested parties' list. APPLICATIONS FOR CDBG and HOME FUNDING AVAILABLE FOR A 30-DAY PERIOD.
December 21, 2022	5:00 PM DEADLINE FOR SUBMITTING PROPOSALS/APPLICATIONS FOR CDBG and HOME FUNDING. Applications must be received in City of El Cajon, Project Assistance Center, 200 Civic Center Way, First Floor, El Cajon, CA 92020 or via email to housing@elcagon.gov by 5:00 p.m. on Wednesday, December 21, 2022.
February 9 and 16, 2023	"Notice of First Public Hearing" to be published in newspaper.
February 28, 2023	FIRST PUBLIC HEARING at 3:00 or 7:00 p.m. (to be determined) to solicit public input and to tentatively allocate FY 2023-2024 CDBG and HOME funds.
March 23, 2023	"Notice of 30-day Public Review Period and Second Public Hearing" to be published in newspaper. Notice includes full listing of approved projects, amounts and regulatory citations, and seeks public input. Draft of One Year Action Plan is available at the El Cajon Project Assistance Center counter, First Floor, 200 Civic Center Way, El Cajon, and on the Housing website at elcagon.gov/housing .
April 6 and 13, 2023	"Notice of Second Public Hearing" to be published in newspaper.
April 25, 2023	SECOND PUBLIC HEARING at 3:00 p.m. to solicit public input and final adoption of FY 2023-2024 One Year Action Plan.
May 12, 2023***	Approximate date for submittal of FY 2023-2024 One Year Action Plan to HUD for approval (***actual date depends on date HUD officially announces allocations).
One week after submittal***	"Notice of Submittal of One Year Action Plan" to be published in newspaper (***actual date depends on date HUD officially announces allocations).
Within 45 days after submittal	***Approximate timeframe for HUD review period for One Year Action Plan.
July 1, 2023	Begin Fiscal/Program Year 2023-2024.

ATTACHMENT B – AREA MEDIAN INCOME LIMITS FOR SAN DIEGO COUNTY

(Subject to annual revisions)

ELIGIBLE INCOME LIMITS CHART 2022

HOUSEHOLD SIZE

		1	2	3	4	5	6	7	8
30%	Extremely low	\$0 to \$27,350	\$0 to \$31,250	\$0 to \$35,150	\$0 to \$39,050	\$0 to \$42,200	\$0 to \$45,300	\$0 to \$48,450	\$0 to \$51,550
50%	Very Low	\$27,351 to \$45,550	\$31,251 to \$52,050	\$35,151 to \$58,550	\$39,051 to \$65,050	\$42,201 to \$70,300	\$45,301 to \$75,500	\$48,451 to \$80,700	\$51,551 to \$85,900
80%	Low	\$45,551 to \$72,900	\$52,051 to \$83,300	\$58,551 to \$93,700	\$65,051 to \$104,100	\$70,301 to \$112,450	\$75,501 to \$120,800	\$80,701 to \$129,100	\$85,901 to \$137,450

Income Limits effective June 1, 2022

ATTACHMENT D – REPORTING REQUIREMENTS AND OUTCOMES FOR FUNDED AGENCIES

Applicants receiving FY 2023-2024 City of El Cajon CDBG and HOME funding must be aware of the following additional reporting requirements.

Why Accurate Reports are Necessary:

CDBG and HOME funds are allocated to projects and programs throughout the City of El Cajon; however the funds originate at the federal level, through the U.S. Department of Housing and Urban Development (HUD). The City of El Cajon is required to report to HUD the accomplishments of each grant given to agencies.

How long will CDBG and HOME Funded Agencies be required to report?

Agencies funded for CDBG Public Services programs: Agencies will be required to submit Quarterly and Annual performance reports on forms provided by the City **for the entire fiscal year in which the program is funded.**

Agencies funded for CDBG Public Facility or CDBG Capital Improvement projects: Pursuant to the CDBG regulations, any real property acquired or improved in whole or in part with CDBG funds in excess of \$25,000 shall be used to meet one of the national objectives (benefit low/moderate income persons) **until five years or more after expiration of the contract with the City.** Therefore, agencies receiving this category of funding will be required to submit Quarterly and Annual performance reports on forms provided by the City for the duration of the contract and **for five years or more after completion of the project.**

Agencies funded for HOME-Funded Production of Affordable Housing: Agencies will be required to submit Quarterly and Annual performance reports on forms provided by the City **for the entire fiscal year in which the program is funded.** Additionally, agencies must provide annual information regarding affordable housing projects **for the entire affordability period in which the project is funded.**

What reports will be required of CDBG-Funded Agencies:

All projects that provide benefit to LMI residents (except those providing an Area Benefit) will be required to collect, and keep records of specific demographic data about their program participants, and to report that data quarterly and annually on forms provided by the City (the Periodic Performance Report). Intake and/or qualification procedures must be developed and in place to capture demographic data and other information from **each participant.** Required report measures include:

- The number of persons assisted;
- Income levels of all persons assisted (30, 50, or 80% of the median income, adjusted for household size; see Attachment B – Area Median Income Limits table);
- Race and ethnicity of the persons assisted;
- The number of persons assisted that are homeless;
- The number that are disabled; and
- The number that are female heads-of-household.

In addition, a narrative report must accompany each Periodic Performance Report and can be tailored to report progress on the objectives of the contract with the City, as well as analyze the benefits of the program to the community. Report measures may include:

- The progress of the activity (progress of construction, % of completion, etc.);
- Amount of Other funds leveraged for the program (how and to what extent CDBG funds were helpful in attracting other grant or donor funds);
- Additional measures of success that were volunteered in the original project Application to attract CDBG funding (number of parents attending meetings, number of new jobs created, etc.)

What type of performance objectives and outcomes are expected of CDBG-Funded

Agencies:

- The project's performance objectives and outcomes for the targeted population are realistic, time bound, and measurable.
- There is a reasonable expectation that the project will be completed during the grant period.
- The proposal has a comprehensive system to develop and align the organization's outcomes with the project's outcomes that are consistent with project design and provide a mechanism for the project's success.
- The project demonstrates realistic and measurable outcomes.
- The outcomes are consistent with the goals of the program.
- The program's mission is consistent with the goals and outcomes of the program.
- Funds will be used to fulfill an unmet need.
- Without City funding the program cannot continue or would require substantial reduction in services.
- If previously funded with CDBG, this program can demonstrate a quantifiable increase in the level of an existing service.

What reports will be required of HOME-Funded Agencies:

Quarterly progress report will be required for projects that are in the pre-development or construction phase. Once the project is placed in service, annual reporting will be required during the affordability period. Sample reporting forms will be provided once a project funding agreement has been signed by all parties.

ATTACHMENT E - INSURANCE REQUIREMENTS FOR PUBLIC SERVICES FOR CDBG AND HOME PROPOSALS

If the Application is funded, the agency will enter into a contract with the City of El Cajon. All City contracts require insurance and indemnification language so that the responsibility for paying claims is established with the agency and ensures that financial resources are available to pay claims. The Subrecipient shall agree to provide an acceptable certificate of insurance and endorsements evidencing coverage as specified in El Cajon City Council Policy D-3, Insurance Requirements which is available from the City, by calling (619) 441-1710, and is made a part of these Guidelines. The insurance requirements listed are minimum requirements and the City in no way warrants that the minimum limits are sufficient to protect the agency from liabilities that might arise from carrying out the funded program. The agency is free to purchase additional insurance, as they deem necessary.

Depending upon the program activities and the program beneficiaries, several types of insurance coverage will be required. This information is provided to help in the development of the overall operating cost of the proposed program and to ensure sufficient funds are set aside for insurance.

Minimum Scope and Limits of Insurance - coverage with limits of liability not less than those stated below are required for funded CDBG or HOME programs.

Commercial General Liability

- General Aggregate \$2,000,000
- Products – Completed Operations Aggregate \$1,000,000
- Personal and Advertising Injury \$1,000,000
- Each Occurrence \$1,000,000

Automobile Liability - Combined Single Limit \$1,000,000

- Required only if activities involve the use of transportation in the provision of services
- Bodily Injury and Property Damage for any owned, hired, and non-owned vehicles used in the performance of this Contract.

Worker's Compensation and Employers' Liability

- Workers' Compensation
- Statutory
- Employers' Liability
- Each Accident \$100,000
- Disease – Each Employee \$100,000 Disease - Policy Limit \$500,000

Professional Liability - Errors and Omissions Liability

- Required only if activities involve providing professional services
- Each Claim \$1,000,000
- Annual Aggregate \$2,000,000

NOTICE OF CANCELLATION: Insurance policies must be the appropriate coverage for and shall not be suspended, voided, canceled, reduced in coverage or endorsed to lower limits.

ACCEPTABILITY OF INSURERS: Insurance is to be placed with insurers duly licensed or approved unlicensed companies in the state of California and with an "A.M. Best" rating of not less

than B+ VI. The City in no way warrants that the above-required minimum insurer rating is sufficient to protect the Agency from potential insurer insolvency.

VERIFICATION OF COVERAGE: The City must receive certificates of insurance (ACORD form or equivalent approved by the City) as required. The certificates for each insurance policy are to be signed by a person authorized by that insurer to bind coverage. The City of El Cajon must be listed as an additional insured (to the extent City is indemnified pursuant to the Indemnity Provisions herein) on all certificates of insurance.

PROFESSIONAL LIABILITY INSURANCE: Professional liability insurance protects against losses that occur when a "professional" fails to practice his or her art to the usual and customary standards of that profession.

Therefore, there can be risks to the Agency associated with errors (or allegations of errors) in the professional's work product or judgment. In order to determine if your proposed program will need professional liability insurance, ask yourself:

1. Will the program employ professional licensed or certified workers (i.e. accountants, teachers, medical professionals, psychologists, etc.)?
2. Will the information developed by the professional be used in a decision-making process within the Agency that could create a liability?

If the answer is **yes** to either of these questions, then professional liability insurance would be required.

The types of losses that can occur under such circumstances are often excluded under general liability policies. They can be covered through separate professional liability insurance policies, also known as "**errors and omissions**" (E&O) liability insurance.

Examples of services that would require professional liability coverage include but are not limited to:

Accountants	Childcare workers	Consultants
Auditors	Financial consultants	Teachers
Attorneys	Medical professionals	Social Workers

****Note: See further Insurance Requirements (Council Policy D-3)***

ATTACHMENT F - INSURANCE AND CONSTRUCTION BONDING REQUIREMENTS FOR PUBLIC FACILITY/CAPITAL PROJECTS/HOUSING FOR CDBG AND HOME PROPOSALS

If the Application is funded, the agency will enter into a contract with the City of El Cajon. All City contracts require insurance and indemnification language to protect against loss during construction activity. In construction or renovation contracts, the agency is responsible for insuring against direct physical damage to the construction project as well as to construction materials stored at the construction site. Therefore, in addition to the required liability and workers' compensation insurance, the City also requires the agency to provide evidence of property insurance, which will protect the project site against damage while under construction. This is done either through specialized property insurance forms known as "builders' risk insurance" or an "installation floater".

Builders' risk insurance is designed to cover buildings and construction materials while in the course of construction. Builders' risk insurance is a form of property insurance that protects the construction project against loss or damage caused by a variety of perils, i.e. fire, wind, hail, etc.

Installation floaters are similar to builders' risk insurance policies in that they are designed to cover damage to material and equipment to be installed in an 'existing building'. Installation floaters are required from contractors performing a specialized job on an existing building or installing equipment or materials that are *not* included in a construction project contract. An example would be a contract to replace the plumbing/fixtures in a bathroom of an existing building.

INSURANCE REQUIREMENTS FOR PUBLIC FACILITIES/CAPITAL/ HOUSING PROJECTS

Property Insurance

- The agency must ensure property insurance is carried throughout the term of the Project and all risk property insurance on the building and all improvements for their full replacement value.
- The agency's insurance policy must be endorsed to include the City of El Cajon as a loss payee.
- The agency's insurance policy cannot be cancelled without (30) days prior written notice given to the City.
- The agency is responsible for all policy premiums and deductibles.
- The agency shall furnish the City with a certificate of insurance (ACORD form or equivalent approved by the City) as required by this Contract. A person authorized by that insurer to bind coverage on its behalf must sign the certificate.

Liability Insurance

If funded, the agency shall provide proof of general liability insurance in an amount acceptable to the City throughout the term of the Project. The City of El Cajon must be listed as an additional insured.

CONSTRUCTION, LABOR, AND MATERIAL PAYMENT AND PERFORMANCE BONDS

Prior to the commencement of any rehabilitation, the construction contractor must post a construction labor and material payment bond and performance bond for the total amount of the rehabilitation contract in a form as approved by the City.

RESOURCES AND REFERENCES:

- [Community Development Block Grant Entitlement Grant Program](#)
- [CDBG: Playing by the Rules: A Handbook for CDBG Subrecipients](#)
- [Monitoring Checklists](#)
- [The Code of Federal Regulations \(CFR\)](#)
- [Limited English Proficiency Requirements](#)
- [Home Investment Partnerships Act Program](#)